

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISIONFILED-USDC-NDTX-DA
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UNITED STATES OF AMERICA

NO.

3-25CR-079 R

v.

ROBERT EARL TALBOTT

INDICTMENT

The United States Grand Jury charges:

Count One

Stalking

[Violation of 18 U.S.C. §§ 2261A(2)(A) and (B) and 2261(b)]

Beginning in or about January 2024, and continuing through on or about February 12, 2025, in the Northern District of Texas and elsewhere, defendant **Robert Earl Talbott**, with the intent to kill, injure, harass, and intimidate, and place under surveillance with intent to kill, injure, harass, and intimidate another person, namely Victim 1, did use an interactive computer service, an electronic communication service, an electronic communication system of interstate commerce, and any other facility of interstate and foreign commerce, including the internet, a cellular network, and a cellular telephone, to engage in a course of conduct that (a) placed Victim 1 in reasonable fear of death and serious bodily injury, and (b) caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Victim 1.

In violation of 18 U.S.C. §§ 2261A(2)(A) and (B) and 2261(b).

Counts Two Through Four
Transmitting a Threatening Communication in Interstate Commerce
[Violation of 18 U.S.C. § 875(c)]

On or about the dates identified below, in the Northern District of Texas and elsewhere, defendant **Robert Earl Talbott** knowingly transmitted in interstate and foreign commerce the telephone communications identified below containing threats to injure the person of another, namely Victim 1, for the purpose of issuing threats, with knowledge that the communications would be viewed as threats, and with conscious disregard of a substantial risk that the communications would be viewed as threats, each communication forming a separate count:


Count	Date	Threatening Communication
Two	September 27, 2024	Text message stating, “paper doesn’t stop a bullet [XXXX] and I know where you live,” “in case you think I’m bluffing like last time . . . sleep with one eye open,” and including the address of Victim 1’s residence and workplace.
Three	December 21, 2024	Text message stating, “I’ve made the proper calls. Get your affairs on order [XXXX]. This was the last straw. You’ve got 2 weeks to live due to travel. Make them count!! ;)”
Four	December 21, 2024	Voicemail stating Talbott had just crossed state lines and was going to enjoy taking every piece of flesh off of Victim 1’s bones and feeding it to her.

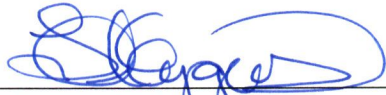
All in violation of 18 U.S.C. § 875(c).

A TRUE BILL


FOREPERSON

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v.

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INDICTMENT

18 U.S.C. §§ 2261A(2)(A) and (B) and 2261(b)
Stalking
(Count 1)

18 U.S.C. § 875(c)
Transmitting a Threatening Communication in Interstate Commerce
(Counts 2-4)

4 Counts

A true bill rendered

DALLAS

Filed in open court this 26th day of February, 2025.


FOREPERSON

Defendant in Federal Custody since 2/12/2025.


UNITED STATES MAGISTRATE JUDGE
Magistrate Court Number: 3:25-MJ-88-BT